United States Department of the Interior

FISH AND WILDLIFE SERVICE
Sacramento Fish and Wildlife Office
2800 Cottage Way, Room W-2605
Sacramento, California 95825-1846

In Reply Refer To:
81420-2011-TA-0195-1

JAN 10 2011

Mr. Blake Lyon, Senior Planner
Redwood City Planning, Housing, and
Economic Development Department
1017 Middlefield Road
Redwood City, California 94063

Subject: Comments regarding the Notice of Preparation of an Environmental Impact Report for the Proposed Saltworks Project, City of Redwood City, San Mateo County, California

Dear Mr. Lyon:

The U.S. Fish and Wildlife Service (Service) appreciates the opportunity to respond to the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the proposed Saltworks Project. We understand that the project proposed by DMB Redwood City Saltworks, LLC includes a 1,436-acre mixed-use project consisting of 8,000-12,000 residential units of various densities, up to one million square feet of office space, and 140,000 square feet of commercial space. The project would include a variety of community facilities, an extension of the Bay Trail, and restoration of approximately 436 acres of tidal marsh habitat.

Because the proposed development has potential effects to listed species and their habitats that are present within and near the project site, we recommend the following be thoroughly evaluated as part of the EIR.

Effects to Listed Species:

The proposed project is adjacent to Greco Island, the largest extent of remaining tidal marsh within the Don Edwards San Francisco Bay National Wildlife Refuge (Refuge). This tidal marsh and associated intertidal mudflats provide habitat for listed and special-status species, such as the Federal- and State-endangered salt marsh harvest mouse (*Reithrodontomys raviventris*), the Federal- and State-endangered California clapper rail (*Rallus longirostris obsoletus*), and the State-threatened California black rail (*Laterallus jamaicensis coturniculus*). Greco Island has one of the largest populations of California clapper rail with the highest rate of nest success. The salt marsh harvest mouse has been observed adjacent to the project site; some of the barren to sparsely-vegetated levees within the salt ponds are known to be used for nesting by the Federal-threatened western

snowy plover (*Charadrius alexandrines nivosus*); and the Federal- and State-endangered California least tern (*Sternula antillarum browni*) may use the project site for roosting and foraging as recognized in the NOP.

Due to the potential to impact these species, we recommend the analysis include all direct and indirect effects resulting from, but not limited to, construction of the proposed project and increased presence of people, pets and other urban activities. Specifically, assess the potential for nest abandonment during the breeding season that may result in the mortality of California clapper rail and black rail chicks; the introduction of non-native animal species (e.g., Norway rats, feral cats, red foxes) that prey on California clapper rails, black rails, and salt marsh harvest mice; and the potential for the creation of artificial perches for raptors that prey on these species such as buildings, towers, and transmission lines adjacent to the salt marsh.

Other Ancillary Effects:

We recommend you evaluate human activities that may result in the introduction of non-native plant species (e.g., perennial pepperweed and *Spartina alterniflora*) that degrade the quality of the salt marsh habitat and interfere with the establishment of *Grindelia* which the California clapper rail uses as high tide cover and nesting substrate in the high marsh. The proposed development of housing, roads, a ferry service, and recreational boating adjacent to the salt marsh may introduce contaminants such as petroleum hydrocarbons that may directly or indirectly affect the listed salt marsh species through toxicity or a decrease in the invertebrate prey base. In addition, these facilities and activities can increase human disturbance to adjacent wetlands and may act as an attractant to gulls that prey on salt marsh species.

We recommend evaluating construction noise, lighting and vibration that may displace these species temporarily and/or permanently from the area. Construction activities may impact sensitive breeding and nesting periods for these species. In addition, lighting and noise may affect species after construction is complete and the project is occupied. Lights should be designed with wildlife species in mind using appropriate wavelength light sources that are shaded to direct lights away from refuge lands or restored marshes within the project site.

Effects of Water Diversion from the Central Valley:

The water use and diversion for the proposed project should be analyzed in this EIR. Currently it is unclear if the proposed project will receive its water from the Kern Water Agency. Any water used for the proposed project would be a permanent use and not an interim transfer. The effects of water deliveries through the State and Federal export facilities were analyzed in the Service's 2008 biological opinion on *the Proposed Coordinated Operations of the Central Valley Project and the State Water Project.* The assignment of water to the proposed project was not an action that was described or analyzed in this biological opinion. Therefore, this project's use of water would need to be analyzed for its effects to listed delta smelt (*Hypomesus transpacificus*) as well as listed salmonids and the State listed longfin smelt (*Spirinchus thaleichthys*).

Effects Due to Sea Level Rise:

We recommend you evaluate the potential for the project to preclude landward migration of marsh in the face of sea level rise, which may result in the eventual elimination of salt marsh habitat, in addition to the loss of an important buffer to coastal flooding. The restoration of 436 acres of tidal marsh within the proposed project should consider the creation of upland transitional habitat that provides upland cover for California clapper rails and salt marsh harvest mice and a buffer to sea level rise. The EIR should also analyze the potential need for additional flood protection due to sea level rise.

This project lies within the proposed additions boundary and is adjacent to the Greco Island Unit of the Refuge. The proposed additions boundary recognizes lands of important conservation value as identified in an Environmental Assessment (EA) prepared in 1990. This boundary has no regulatory authority but simply provides authority to the Service to acquire lands from willing sellers as additions to the Refuge. The boundary contains more land than is authorized by Congress because it is recognized that not all lands within the boundary will be added to the refuge. Additionally, we recommend that the loss of restoration opportunities relative to the Baylands Ecosystem Habitat Goals Report be analyzed in this EIR.

Please keep us informed of the EIR process, especially any and all future opportunities to provide comments. If you have any questions, please contact Ryan Olah or Joseph Terry at (916) 414-6600 or Eric Mruz, at (510) 792-0222 x125.

Sincerely,

Cay C. Goude

Cay C. Goude
Assistant Field Supervisor

cc:
Scott Wilson, California Department Fish and Game